

June 6, 2025

VIA E-FILING AND HAND DELIVERY

The Honorable Christopher J. Burke
J. Caleb Boggs Federal Building
844 N. King Street
Wilmington, DE 19801

Re: *British Telecommunications PLC, et al. v. Palo Alto Networks, Inc.*
D. Del. C.A. No. 22-1538-CJB

Dear Judge Burke:

Plaintiffs British Telecommunications plc, and BT Americas, Inc. (collectively “BT”) and Defendant Palo Alto Networks Inc. (“PAN”) jointly (collectively “Parties”) submit this letter in response to the Court’s Oral Order on May 30, 2025 (D.I. 152) ordering the parties to file a joint status report updating the Court on the status of the *ex parte* reexamination (“EPR”) proceeding for the U.S. Patent 7,159,237 (“’237 Patent”)—the sole patent-in-suit.

On February 16, 2024, PAN filed EPR No. 90/019,422 (“First EPR”) which was instituted on all claims of the ’237 Patent on May 14, 2024. On June 20, 2024, the Court stayed this case pending the First EPR.

On January 30, 2025, the USPTO entered a Notice of Intent to Issue Reexamination Certificate confirming patentability of all claims. On February 4, 2025, PAN filed a second EPR (“Second EPR”)—No. 90/019,841—against all claims of the ’237 Patent.

The First EPR concluded on February 24, 2025, with the USPTO confirming patentability of all claims.

On March 27, 2025, the USPTO ordered reexamination of the ’237 Patent for the Second EPR. On March 27, 2025, BT also filed an opposition to PAN’s Second EPR, which requested a discretionary denial of the Second EPR. On April 10, 2025, PAN filed a response to BT’s request for discretionary denial. The Parties are awaiting the USPTO’s decision on BT’s request for discretionary denial and the USPTO’s first office action.

BT remains ready and willing to proceed with the District Court case before Your Honor.

PAN respectfully notes that the Second EPR has been pending for four months and is expected to conclude in the next eight months. Accordingly, PAN respectfully submits that the

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case should be stayed until the Second EPR, which challenges all the asserted claims of the '237 Patent, is complete.

Respectfully,

/s/ Philip A. Rovner

Philip A. Rovner (#3215)

PAR/mas/12284183
cc: Counsel of Record (via E-File)